

PICCOLO LAW OFFICES
Matthew C. Piccolo
Nevada State Bar No. 14331
matt@piccololawoffices.com
8565 S. Eastern Ave., Ste. 150
Las Vegas, NV 89123
Telephone: (702) 630-5030
*Attorneys for Brandon Elggren and
South Ridge Microsurgical, Inc.*

SPAULDING LAW
Brady Brammer
Pro Hac Vice Application Forthcoming
bbrammer@spauldinglaw.com
1955 W. Grove Parkway, Suite 250
Pleasant Grove, UT 84062
Telephone: (801) 839-4653

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOSEPH FIORAVANTE, an individual;
MODERN ORTHOPAEDICS, LLC, a
Nevada Corporation,

Plaintiff,

vs.

LEICA MICROSYSTEMS, INC., a
Delaware corporation; SOUTH RIDGE
MICROSURGICAL, INC., a Utah
corporation; STEVE MILAZZO, an
individual (California); BRANDON
ELGGREN, an individual (Utah); DOES I
through X, inclusive; and ROE
CORPORATIONS I through X, inclusive,

Defendants.

CASE NO. 2:18-cv-00059-GMN-CWH

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE A
RESPONSIVE PLEADING TO
PLAINTIFF'S COMPLAINT**

(Second Request)

COMES NOW, Plaintiffs Joseph Fioravante and Modern Orthopaedics, LLC,
("Plaintiffs") and Defendants, Brandon Elggren and South Ridge Microsurgical, Inc., collectively
the ("Applicable Defendants"), through counsel, hereby stipulate and agree pursuant to Local
Rules 6-1, 6-2 and 7-1 as follows:

STIPULATION

IT IS HEREBY STIPULATED by Plaintiffs and Applicable Defendants that Defendants
Brandon Elggren and South Ridge Microsurgical, Inc. shall have an extension of time until April

1 9, 2018 to file a responsive pleading to Plaintiff's Amended Complaint [Dkt. 3] in order to allow
2 additional time for the Applicable Defendants to evaluate the allegations set forth in the Amended
3 Complaint and the factual circumstances underlying such allegations. Plaintiffs are agreeable to
4 the requested extension as a matter of professional courtesy.

5 This is the second stipulation for an extension of time for the Applicable Defendants to
6 respond to the Amended Complaint. The parties previously stipulated to extend Defendants'
7 deadline to file a responsive pleading until March 26, 2018.

8 IT IS FURTHER STIPULATED by the parties that this stipulation does not constitute any
9 waiver of claims for defenses and that the extension of time to file a responsive pleading includes
10 an extension to file a Motion to Dismiss pursuant to FRCP 12(b).

11 IT IS FURTHER STIPULATED by the parties that this stipulation is made in good faith
12 and not for the purposes of delay.

13
14 Dated: March 26, 2018

Dated: March 26, 2018

15
16 By: /s/ Matthew C. Piccolo
17 Matthew C. Piccolo
18 Nevada State Bar No. 14331
19 **PICCOLO LAW OFFICES**
8565 S. Eastern Ave., Ste. 150
Las Vegas, NV 89123

By: /s/ M. Lani Esteban-Trinidad*
M. Lani Esteban-Trinidad
Nevada Bar No. 6967
THE THATER LAW GROUP, P.C.
6390 W. Cheyenne Ave, Ste. A
Las Vegas, Nevada 89108
* With Permission

20
21 *Attorneys for Defendants Brandon Elggren*
22 *and South Ridge Microsurgical, Inc.*

Attorneys for Plaintiffs Joseph
Fioravante and Modern Orthopaedics,
LLC

23 **IT IS SO ORDERED:**

24
25 Dated: March 27, 2018



United States Magistrate District Judge

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

Executed: March 26, 2018.

Matthew C. Piccolo